

<p>UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK</p> <p>----- X</p> <p>UNITED STATES OF AMERICA</p> <p>- v. -</p> <p>HO WAN KWOK, a/k/a "Miles Guo," a/k/a "Miles Kwok," a/k/a "Guo Wengui," a/k/a "Brother Seven," a/k/a "The Principal," KIN MING JE, a/k/a "William Je," and YANPING WANG, a/k/a "Yvette," Defendants.</p> <p>----- X</p>	<p>PETITION UNDER FED. R. CRIM. P. 32.2 AND 21 U.S.C. § 853(n) FOR ADJUDICATION OF PETITIONER'S RIGHT TO SPECIFIC PROPERTY OF [\$218,500.00]</p> <p>S1 23 CR 118 (AT)</p>
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I, Anne Lee (the Petitioner”), pursuant to 21 U.S.C. § 853(n) and Rule 32.2(c) of the Federal Rules of Criminal Procedure, hereby respectfully petitions the Court for a determination of the Petitioner’s interest in specific property subject to the Court’s Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, signed by Your Honor on January 6, 2025 and entered on January 7, 2025, (the Forfeiture Order”) which includes various bank accounts (Forfeited Accounts”), Dkt. 488, to exclude all property in which the Petitioner has right, title, and interest, namely, \$218,500.00 (the Property”). In support hereof, the Petitioner states as follows:

1. Between 2020 to 2023, I, the Petitioner wired \$218,500.00 in total to participate in the projects.
2. I, the Petitioner transferred U.S. currency to the Forfeited Accounts as below :
3. On October 20, 2020 – Sent \$20,000.00 via Order Number GC2010210105441 to G|CLUBS for Initial Membership Payment (G|CLUBS membership). Funds transferred into Account Number MBI10103-000 at Mercantile Bank International, held in the name of “G Club International Ltd.” and seized by the Government on or about October 16, 2022 (23-FBI-000287).

4. On December 14, 2020 – Sent \$10,000.00 via Order Number HT2012142337301 to G|CLUBS for Initial Membership Payment. Funds transferred into Account Number MBI10103-000 and seized on October 16, 2022 (23-FBI-000287).
5. On April 5, 2021 – Sent \$20,000.00 via Order Number JJ2104051745401 to G|CLUBS for Initial Membership Payment. Funds transferred into Account Number MBI10103-000 and seized on October 16, 2022 (23-FBI-000287).
6. On August 3, 2021 – Sent a check for \$50,000.00 via Order Number EE2108040002521 to G|CLUBS for Initial Membership Payment. Funds transferred into Account Number MBI10103-000 and seized on October 16, 2022 (23-FBI-000287).
7. On December 14, 2021 – Sent \$2,500.00 via Order Number MU2112150331581 to G|CLUBS for Annual Membership Fee. Funds transferred into Account Number MBI10103-000 and seized on October 16, 2022 (23-FBI-000287).
8. On October 7, 2022 – Sent \$2,500.00 via Order Number PS2210072158471 to G|CLUBS for Annual Membership Fee. Funds transferred into Account Number MBI10103-000 and seized on October 16, 2022 (23-FBI-000287).
9. On November 30, 2022 – Sent \$2,500.00 via Order Number SP2212010337221 to G|CLUBS for Annual Membership Fee. Funds transferred into Account Number MBI10103-000 and seized on October 16, 2022 (23-FBI-000287).
10. On January 26, 2022 – Invested [\$111,000.00] with Hamilton Opportunity Fund via bank transaction Number 13411144221. Funds transferred into account number 5090042770 at Silvergate Bank, held in the name of Hamilton Opportunity Fund SPC, and seized on September 18, 2022 (23-FBI-000074).

Transaction Type	Wire number	Total Amount	Payment Method	Recipient	Asset ID
Membership	GC2010210105441 HT2012142337301 JJ2104051745401 EE2108040002521	\$20,000 \$10,000 \$20,000 \$50,000	Total 4 checks	G-club	23-FBI-000287
Annual Fee	MU2112150331581 PS2210072158471 SP2212010337221	\$2500.00 \$2500.00 \$2500.00	Check Check Check	G-club	23-FBI-000287
Digital Bank investment		\$111,000	Wire	Hamilton Opportunity Fund SPC	23-FBI-000074

11. I the petitioner never received any funds or investment back from the investments before they were seized by the government, having now suffered a total of unrecovered funds of my \$218,500.00 investment.
12. I, the petitioner, was not consulted prior to the entry of the Forfeiture Order. Petitioner had no knowledge that Defendant Wang consented to forfeit the Property. I invested in G|CLUBS and Hamilton Opportunity Fund to support the Whistleblower Movement which is led by Miles Guo. My family and I have experienced persecution by the CCP, and I believe that Mr. Guo is not lying; he is simply doing the right thing to take down the CCP.
13. As an owner of the above listed assets, I, the petitioner has an interest in the Property which Defendant Wang had no authority to agree to forfeit. Rather, Petitioner has a superior interest in the Property which cannot be the subject of the Forfeiture Order relating to Defendant Wang.
14. I was not involved in, nor did I have any knowledge of the Defendants' activities. Accordingly, I am also an innocent third party pursuant to 21 U.S.C. § 853(n). Any third party asserting a legal interest in property which has been ordered forfeited to the United States pursuant to this section may... petition the court for a hearing to adjudicate the validity of his alleged interest in the property.” 21 U.S.C. § 853(n)(2). The petition, which is sworn and signed by the me, shall set forth the nature and extent of the petitioner s right, title, or interest in the property, the time and circumstances of the petitioner s acquisition of the right, title, or interest in the

property, and additional facts supporting the petitioner's claim, and the relief sought." Id. § 853(n)(3).

15. Here, I, the petitioner is the lawful owner of the Property.

16. Alternatively, Petitioner is a bona fide purchaser for value of my interest in the Property under 21 U.S.C. § 853(n)(6)(B).

17. Petitioner was made aware of the Order of Forfeiture by viewing it at www.forfeiture.gov (which was published from February 6, 2025 through March 7, 2025) noting that: pursuant to Title 21, United States Code, Section 835(n), persons other than the defendant who wish to assert a legal interest in property that has been ordered forfeited to the United States must file a petition for a hearing to adjudicate the validity of their alleged interest in the property with the Court within thirty (30) days of the final publication of notice, or receipt of actual notice, whichever is earlier."

18. Petitioner has filed this petition within 60 days of the initial publication of notice.

WHEREFORE, Petitioner respectfully requests and petitions this Court:

- a. to amend the Forfeiture Order to exclude the Property in which Petitioner has a rightful interest as an innocent third party, superior interest, and/or a bona fide purchaser for value.
- b. A hearing pursuant to 21 U.S.C. § 853(n) on any disputed matters.
- c. Compensation for the value of Petitioner's interest if the Petition is denied;
- d. Any other relief the Court deems just and proper.

Dated: March 26, 2025

Respectfully Submitted,

Anne Lee

A handwritten signature in black ink, appearing to read 'Anne Lee', is written over a horizontal line.

Signature

VERIFICATION

I attest and declare under penalty of perjury that my petition is not frivolous, and the information provided in support of my petition is true and correct to the best of my knowledge and belief.

Executed on March 26, 2025, in New York City, New York, USA.

Anne Lee

A handwritten signature in black ink, appearing to read 'Anne Lee', written over a horizontal line.

Signature